

# Exhibit G

**From:** Joseph Saltiel  
**Sent:** Friday, November 11, 2022 10:05 AM  
**To:** Arthur Wellman; Eugene Hahm; Eric Findlay; bcraft@findlaycraft.com; Debby Gunter; Nick Woloszczuk  
**Cc:** Barry Irwin; BShelton@winston.com  
**Subject:** Repairify, Inc. v. Keystone Automotive Industries, Inc. et al, No. 21-cv-00819 - Notice to the Court of Discovery Dispute

Counsel,

Pursuant to Judge Albright's Standing Order, below is a chart with a summary of the issues and requested relief that we are seeking from the Court. As stated in Judge Albright's Standing Order, please provide your response in the chart within three business days so that we can then email the summary of issues to the Court.

Issue	Elitek's Position	Repairify's Position
Technical documents related Repairify's products that purportedly embody the asserted claims, (RFP Nos. 5, 11, 12, 43, 49)	<p>While Repairify indicated that it was going to start producing documents by September 16, 2022, its first production was not produced until September 29, 2022, which was limited to 9 documents and did not include any technical documents. Repairify stated that additional documents would be produced by October 14, but that production did not include these documents. Repairify then indicated that these documents would be produced by October 28, but they were not. Elitek asked Repairify to commit to producing technical documents by November 17, but Repairify refused to agree to produce documents by then and instead stated they will be produced "shortly." Repairify still has not produced these documents.</p> <p>Relief: Order that Repairify produce technical documents related to its products within seven days.</p>	
Marketing and advertising documents related to Repairify's products that	While Repairify indicated that it was going to start producing documents by September 16,	

<p>purportedly embody the asserted claims (RFP Nos. 19, 31-34)</p>	<p>2022, its first production was not produced until September 29, 2022, which was limited to 9 documents and did not include any of these documents. Repairify stated that additional documents would be produced by October 14, but that production did not include these documents. Repairify then indicated that these documents would be produced by October 28, but they were not produced. Elitek asked Repairify to commit to producing documents by November 17, but Repairify refused to agree to produce documents by then and instead stated they are working on producing them without an indication of when they will be produced.</p> <p>Relief: Order that Repairify produce marketing and advertising documents related to its products within seven days.</p>	
<p>Detailed sales information related to Repairify's products that purportedly embody the asserted claims (RFP Nos. 19, 31-34)</p>	<p>While Repairify indicated that it was going to start producing documents by September 16, 2022, its first production was not produced until September 29, 2022, which was limited to 9 documents, three of which were company financial statements. Repairify stated that additional documents would be produced by October 14, but that production did not include detailed sales information. At an October 19 meet and confer Repairify stated it would amend its discovery responses to confirm it was no longer seeking lost profits or an injunction, which would affect the relevancy of the discovery sought. Repairify's amended responses, however, reserved its rights to pursue lost</p>	

	<p>profits and an injunction at a later date. Elitek informed Repairify that its reservation did not relive it of its obligation to produce detailed sales information and asked for those documents to be produced by November 17. Repairify stated they are working on it without an indication of when they will be produced.</p> <p>Relief: Order Repairify to either drop its request for lost profits and an injunction or produce the requested detailed sales information within seven days.</p>	
Assignments, licenses, and agreements related to the asserted patents (RFP Nos. 10, 13, 16, 23, 30)	<p>Repairify has produced only some of these documents, some of which were not produced until after Elitek filed a motion to dismiss related to ownership, and some of the documents that have been produced are incomplete. For example, a license agreement produced is missing several exhibits and schedules. Nor did Repairify produce any documents related to this license agreements such as royalty reports, price lists, or fees paid. Elitek asked Repairify to produce these documents by November 17. Repairify refused to commit to produce these documents by then, and instead, said they would be produced shortly. Repairify has not yet produced these documents.</p> <p>Relief: Order that Repairify produce all documents related to any license, agreement, or assignment related to the asserted patents within seven days.</p>	
Documents related to the prosecution of the asserted patents, including digital files	Repairify has not produced any internal file histories or the digital files received from Mr.	

<p>from Mr. Fischer (the prosecuting attorney) and any internal files (RFP Nos. 4, 20, 23-24)</p>	<p>Fischer, one of the attorneys who prosecuted the asserted patents, in October relating to prosecution of the asserted patents. Repairify did not agree to produce these documents by November 17. Instead Repairify stated that it will produce Mr. Fischer's digital files at some point before Mr. Fischer's December 15 deposition.</p> <p>Relief: Order that Repairify produce documents related to the prosecuting of the asserted patents, including any internal files and Mr. Fischer's digital files, within three days.</p>	
<p>ROG No. 14 – Identify the individuals involved in the prosecution of the Asserted Patents, the time period of their involvement, the applications they were involved with, and the nature of their involvement.</p>	<p>In response to the interrogatory, Repairify identified a list of 22 people, but Repairify did not provide any other information about them such as what their role was, the time period of their involvement, and which applications they were involved with. Repairify. Repairify argues that it does not have all the information requested and asked Elitek to narrow its request to specific tasks and to also seek this information first from third parties. Elitek asked for Repairify to provide the information it knows with respect to the people identified.</p> <p>Relief: Order Repairify to identify additional information it knows about the people it identified such as which applications the people listed were involved, the time period of their involvement, and the nature of their involvement within seven days.</p>	

Best regards,

Joe Saltiel

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Intellectual Property Litigation

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